From: Laabs, Chris To: Waye, Don

Sent: 10/21/2014 10:08:10 AM

Subject: RE: 6217 guidance for Marinas/rec boats

Don,

Thanks for the leads and insight. I'll keep you posted on what direction we take.

Chris

From: Waye, Don

Sent: Tuesday, October 14, 2014 11:15 AM

To: Laabs, Chris

Cc: Solloway, Chris; allison.castellan@noaa.gov **Subject:** RE: 6217 guidance for Marinas/rec boats

Chris,

You are asking for a lot. I can't provide all that info, but here's a start...

Here's the CZARA 6217(g) guidance from 1993 (required by the 1990 statute) for all NPS categories:

http://water.epa.gov/polwaste/nps/czara/index.cfm

The marinas category is Chapter 5. There are 15 unique management measures (MMs). Most can be addressed by states implementing a well-run Clean Marinas program; however I do not believe there are national standards for what constitutes a complete Clean Marinas program.

Chris Solloway is our branch's lead for the marinas MMs under CZARA. In 2001 we updated our marinas guidance: http://water.epa.gov/polwaste/nps/marinas/mmsp_index.cfm

The 2001 guidance applies nationally; not just for coastal states. But the 1993 coastal guidance is binding for the 34 states and territories that choose to participate in the NOAA-administered Coastal Zone Management Program. We also have a general Marinas page here with other resources, however, most a fairly dated: www.epa.gov/nps/marinas

It is NOT true that Oregon is the only state with an unapproved Coastal Nonpoint Pollution Control <u>Program</u> (... not a "<u>plan</u>"...) under CZARA. Out of 34 states & territories, about 2/3rds have fully approved programs. So, at least 22 are fully approved for the 15 marinas MMs. Of the remainder, many have achieved interim approval of all of these MMs. For example, Oregon has interim approval of all 15 marinas MMs (... its biggest gap under CZARA is with forestry/timber concerns).

Allison Castellan is my primary contact with NOAA. She may be able to refer you to a better NOAA contact for Clean Marinas. NOAA used to maintain a Clean Marinas Initiative website (http://cleanmarinas.noaa.gov/), but that has recently gone away. I'm not sure why.

I don't know what major associations are working on marinas issues. Your CSO guess is probably a good one.

I am not aware of any assessments on the success of the Clean Marinas programs. These are state programs, so my guess is there's quite a lot of variation between states on what they look like, how they are being implemented and how many marinas are actually certified. My fear is that this was a somewhat popular idea in the early 2000s, and that at least for some states, interest/funding/energy to sustain and expand the programs may have waned.

Pursuing answers to your questions might be a great intern project...

Don Waye

U.S. EPA - Nonpoint Source Control Branch

ED465-00016587 EPA-6822_035349

Phone: 202-566-1170

From: Laabs, Chris

Sent: Friday, October 10, 2014 1:03 PM

To: Waye, Don

Subject: 6217 guidance for Marinas/rec boats

Don,

We are looking at marinas/rec boats as a source of pollution. I spoke to Robert a bit about this and he said you would be a good contact for NOAA/NPS work related to CZARA. I've also contacted Meghan about 319 marina funding.

Can you provide me with the 6217 guidelines to states for marinas? I understand that all but Oregon have approved plans(overall plans/not just marinas). Do these get reviewed every so often?

What do you think are the major pollution problems with marinas/rec boats?

Who are your contracts over at NOAA?

Who are the major associations/groups working in this area? Coastal States Org, NERRA, ACWA, Assoc of Marina Industries,

Do you have any assessments or know of any analysis of the Clean Marinas programs? Which states have them? What success rates? What % of marinas are covered? Ect.

Thanks

Chris Laabs 202-566-1223 WJC – West Building MC 4504T 1301 Constitution Ave NW Washington, DC 20460

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